Hi, my name is George Skoubis and I would like to comment on the FCC-04-29A Document, ET Docket No. 03-104, and ET Docket No. 04-37.

In Para 43. the document proposes making Access BPL system operators notify an industry-operated entity of the location, frequency and type of modulation (and make this available to the public). I agree with this proposal but would go farther and also require the Access BPL system operator to publish this information in a legal notice in the community's newspaper as the county, city, town, and village governments are required to do before they implement a change that may have a wide impact.

I think the database needs to be central rather than operated by each Access BPL system operator. A central database can be searched more easily and the public and government agencies shouldn't have to search many databases when it would be easy to require all systems to keep a central one updated. The industry-operated entity could be an organization formed and funded by the power companies using the technology and the manufacturers of the devices. The power companies and Access BPL manufactures quoted in your document all contend their devices won't make an impact on existing services, if they maintain a database with the information you propose and there is no interference it will benefit them when they try to move into a new market. Giving the location, frequency, and type of their location is not any more of a burden or a risk of revealing proprietary information than radio services such as commercial FM or AM stations have to go through now.

In Para 44 you propose making the verification procedure for BPL the same as for low speed carrier current systems as they haven't been a source of widespread interference to radio communications. I disagree with this. As the speed of the data transmission goes up it affects a wider frequency range, that is the reason dial-up internet services are limited to their current speed, the frequency range of the existing phone systems doesn't support faster connections unless they use different modulation techniques (such as DSL). Since the BPL devices will be using much faster transmission speeds than present carrier current systems and/or different modulation techniques I think a new verification procedure needs to be developed.

I agree with the Para 45 proposals (especially the in-situ measurements) and guideline changes to the existing measurement techniques.

Para46

(a) Yes, since the power line companies and Access BPL device manufacturers state the signal strength of BPL transmissions decreases rapidly with distance from the power line they should have to measure the signal strength at the line height. Most existing radio services that commented on potential interference employ external antennas to communicate. Most of these antennas are mounted more than 1 meter off the ground and a measurement at that height won't be a good indication of the signal strength near the wires.

(b) I think it is both practical and safe to require in-situ measurements at the height of the line. Since the Access BPL system operator or BPL manufacturer has (or hires) personnel and equipment to safely install and maintain power and BPL equipment at line height they can safely measure at that height.

In Para 47 you propose using the existing In-House BPL and CCS guidelines for measurements until a standard can be adopted. I feel these are adequate for the interim but also feel a date should be set for implementation of these standards. If the date passes and an international standard has not been adopted there should be a provision for a group of interested organizations to develop a standard for the United States.

Thank you for allowing me to comment.

George Skoubis